



Broadband Info Session: March 2022 Eligibility Maps Challenges

Frequently Asked Questions (FAQs) – Rev. 6.28.2022

Eligibility Map Challenge Process

1. Can we challenge a block that is considered Served? 80% served?
 - a. **No. This challenge is for unserved census blocks for this grant, but if you have information that a block should not be considered served, please provide that information, and we will review.**
2. One of the requirements in the challenge process appeared to be for mapping showing plant fiber & line locations. Must this be geocoded data, i.e. in shapefile format or similar? We have Autocad drawings of our plant locations throughout SC but may not have that readily available in a GIS-friendly format for the 6/30 deadline.
 - a. **The GIS template shapefiles must be filled out and submitted with all challenges.**
 - b. **While certain versions of AutoCAD software will allow one to export data to Shapefile format, it is *highly* recommended to use a GIS-based software platform.**
2. Is there any benefit to showing data from school districts that may not be included in the data you have?
 - a. **Student data is provided by the State Department of Education to the ORS for mapping purposes to inform modeling and analytics of eligibility mapping and associated priority areas (i.e. Census Blocks with 20 or more housing units with K-12 students). The ORS will accept additional data provided by ISPs, but the State Department of Education data is the de facto dataset used for the eligibility maps.**
3. Can you have James show the table with the address list? Proposed Served Structure list
 - a. **Through the lens of the Challenge Process: The proposed address list must include the addresses one currently serves or intends to serve upon completion of their project for the census blocks being challenged.**
3. Is there a limit to how many census blocks can be challenged on one form?
 - a. **There is no limit. The ORS would request the challenges be submitted in geographic clusters.**
4. We currently have several projects in progress “under construction” or “awarded to contractors” in areas that are considered unserved and show up pink or red on the eligibility map. Can we apply for funding on these projects?
 - a. **ORS will only reimburse for costs in unserved census blocks incurred after the NTP is issued, under the ARPA SFRF grant program.**
5. We see Census Blocks on the map that are yellow and show they have been funded. However, there are some where we don’t believe the provided funding covered all addresses within the



Office of Regulatory Staff
1401 Main Street
Suite 900
Columbia, SC 29201
(803) 737-0800
ORS.SC.GOV

Census Block(s). There are some where the majority of the addresses within the “Funded” Census Blocks were outside of the Funded area. Should we challenge these Census Blocks so they could be provided additional funding to cover the remainder of the addresses?

- a. **No. This challenge is for unserved census blocks for this grant, but if you have information, please provide that information, and we will review.**
6. There are Census Blocks on the map that show as “Served” but we believe the majority of the addresses within that Census Block do not have access to 25x3. Should we challenge these blocks so they could be provided additional funding to cover the remainder of the addresses?
 - a. **No. This challenge is for unserved census blocks for this grant, but if you have information, please provide that information and we will review.**
7. Do we need to fill out the map challenge form once and list all census blocks, one per serving area/challenged area with multiple census blocks, or one per challenged census block.
 - a. **There is no limit. The ORS would request the challenges be submitted in geographic clusters.**
8. Once we have the maps ready using the template provided by ORS does this need to be submitted as a shapefile, pdf, or both?
 - a. **Submitted as shapefiles only.**
9. If we have active customers in a challenged area is there any acceptable form of proof that does not require an onsite visit? We could show the active customers current internet package, available packages, etc.
 - a. **Billings statements and/or network operations center (NOC) information with customers address will be sufficient.**
10. If we are challenging an area that we are building or plan to build what service ready date is the cut off?
 - a. **More information to be provided soon relating to the Funded Project Register (FPR).**
11. In the SC Broadband Eligibility 032022, there are 41,831 entries in the K12ToStud field that have a value of ‘YES’. When putting data into the template, it will not accept anything other than a number. How or what should I enter instead?
 - a. **The ISP can create a duplicate field in the data and make it a text field. The ORS has also fixed the template GIS and published a new version of it on Citrix and SCdigitaldrive.**
12. I would like to inquire about the Geotagged pictures requirement that the ORS has added to the challenge process and what are some best practices when operationalizing this ask.
 - a. **It is recommended ISPs using Geotagged Photographs of speed tests and completed construction follow the steps below to submit their backup documentation as part of the challenge process:**



Office of Regulatory Staff
1401 Main Street
Suite 900
Columbia, SC 29201
(803) 737-0800
ORS.SC.GOV

- b. **Confirm location services is enabled on your smart device AND allowed using your device camera - MANDATORY**
 - c. **For directions to turn on location services on an Apple device visit:**
<https://support.apple.com/en-us/HT207092>
 - d. **For directions to turn on location services on an Android device visit:**
<https://support.google.com/accounts/answer/3467281?hl=en>
 - e. **At each completed construction site within the Project Service Areas and associated census blocks outlined in the ISP's challenged area, take pictures of work being conducted and/or evidence that shows work has been completed. An equal distribution of photographs should be taken throughout the Project Service Area. Examples include pedestals, splicing, fiber, fiber cabinets (with doors open), aerial and underground fiber construction and installation (depending on type of construction), NID, etc. Please avoid having people in the photographs.**
 - f. **Speed tests should be conducted at completed sites. If using a smart device to run the speed test, take a picture of the screen once the speed test is completed. The picture must be geotagged with location information where the speed test was run. When possible, an equal distribution of photographed speed tests should be taken throughout the Project Service Area and associated census blocks being challenged.**
 - g. **Submit the raw geotagged photos to Citrix under the ISPs Map Challenge Directory. Do not physically attach or embed the photographs (this will drop the latitude/longitude coordinates). Rather, upload the photographs separately as part of the challenge submission process.**
13. There are a number of census blocks that are showing as eligible unserved areas with FUSEDHUS present, but they're actually government owned parcels without anything on them. Our networks are immediately adjacent to them though. How do we address these as challenges if there's no one in the block to serve or show as served? There's no customer data to submit.
- a. **If you don't have infrastructure in that Census block you cannot challenge it. [I think what they are trying to say is - - -there is network but there is no one to serve]**
14. There are some census blocks that clearly aren't residential areas, either marshlands or the middle of a main highway, but they are showing up as high priority areas adjacent to our network. Would you like us to send these to you as fyi's. I think they should probably be included in green served areas or white 'nothing's there' areas.
- a. **Please document these as a challenged area.**
15. In regards to customer data as supporting proof for the eligibility map challenge, what are some examples of NOC information you would accept? If we submitted billing data, would premise address and speed tier suffice? We would likely need to redact all other billing statement info.
- a. **The examples listed above would suffice as long as there is an address tied it.**
16. We would like to request a one-week extension for submitting its challenges to the ARPA Eligibility Map. We believe we may need extra time to put together the mapping data, some of which we did not have readily available at the start of the challenge process. In addition, some



Office of Regulatory Staff
1401 Main Street
Suite 900
Columbia, SC 29201
(803) 737-0800
ORS.SC.GOV

of our key employees on this project have been out of the office or on vacation. Please let us know if such an extension to July 7 would be possible, and if not, if a partial submission would be acceptable (provided that we follow up with the missing elements as soon as possible).

a. **ORS will not provide an extension to the eligibility map challenge.**

17. Where do we find the "Challenge form"? Is it the form that says "Upload a Broadband Project Form"? If so, do I list the GEOID20 numbers in the comments one for each status I am challenging? Then upload all Shapefiles, PDF signed maps, Pictures, Billing Data, Speed test, etc. to the Citrix Share Folder for our ISP?

a. <https://ors.sc.gov/broadband/investments/state/arpaslfrf>

Funding Project Registry (FPR) Questions

1. Can you explain how the project registry due Aug 1 will effect any proposed application in a given area?
- a. **Areas where projects have been accepted by the ORS as part of the Funding Project Registry will not be overbuilt with ARPA SFRF funds unless an additional need for broadband is identified or ORS otherwise determines that the public interest requires funding and such funding is in compliance with ARPA rules and guidelines.**

General ARPA Grant Program Questions

1. If we want to apply for funding in a pink or red census block that we currently have under construction what would the application look like? Example: A pink census block is 50% built. Would we apply for funding on the remaining 50% or would we apply for the cost of the entire census block. If we only apply for the remaining 50% of the census block it would make the cost per subscriber appear to be much less for that block. Is this a concern?
- a. **Census blocks that are unserved are eligible for funding. Any work done before an official Notice to Proceed has been issued by the ORS cannot be reimbursed. If work has been done in a portion of the unserved census block, make sure that the project area you submit in an application only shows the portion of the census block that remains unserved. Then, document on your application that upon completion, 80% of the census block will be served from a combination of previous work performed and the proposed service area.**
2. Can we see the firms who have submitted an application for the areas we have also applied for (or at least certain metrics they believe they can complete the project with)?
- a. **All eligible applications will be uploaded to the ORS website for comments along with Census blocks included as part of a submission. Certain information for example, financial data, from the application may be redacted.**
3. Do you have a preferred application size? Is one large application or multiple small applications preferred?



Office of Regulatory Staff
1401 Main Street
Suite 900
Columbia, SC 29201
(803) 737-0800
ORS.SC.GOV

- a. **One application should be submitted per project. Size of the application does not matter; key is the ability to complete the project before the completion date presented in the timeline. We encourage you to review the federal requirements associated with ARPA funding as larger projects/\$10Million or more may require additional reporting.**
4. I wanted to ask a follow up question regarding overbuild. The presentation stated that eligible projects must not overbuild 25/3, but I was trying to figure out if any portion the area being applied for can be “served” or must the entire area being applied for be defined as unserved? I thought I heard mention of possibly having to cross served areas in order to get to unserved areas. Stated a different way, looking at the South Carolina Eligibility map you presented, can any portion of the “green” area be included in a funding request application if it also encompasses the “red”? If you can answer that and maybe give an example, if needed, that would be great.
 - a. **Only areas that are unserved according to the March 2022 eligibility map will be available for funding. If you must build through a green area to reach the “red” please explain in your application and we will consider the application but we will not pay for drops or connections within a served area.**
5. Will you address cybersecurity in this grant
 - a. **ORS RESPONSE: Cybersecurity is an ineligible expense for this SFRF ARPA grant.**
6. Will projects that include a priority area(s) as well census blocks that have customer locations above 25/3 be eligible for funding?
 - b. **Only areas that are unserved according to the March 2022 eligibility map will be available for funding.**
7. When you say don't overbuild existing 25/3 networks does that include DSL?
 - c. **All areas that have DSL as the only service available in a 2020 Census Block are unserved.**
8. Define affordable?
 - d. **Treasury's guidance provides flexibility for recipients of funds to best determine the threshold of affordability for their communities. ISPs are encouraged to consult with the community as part of the process they undertake to consider affordability and are required to publish the description of their methods for considering affordability in their project selection process. Treasury will also require pricing data as part of program performance and monitoring. ISPs must participate in the Federal Communications Commission's Affordable Connectivity Program, which provides eligible households with discounts on broadband internet access services and devices.**
9. Is this Webex Meeting being recorded for follow-up review at a later date
 - a. **The meeting was not recorded. The slide deck of the presentation and FAQ will be posted on the ORS SFRF ARPA page.**



Office of Regulatory Staff
1401 Main Street
Suite 900
Columbia, SC 29201
(803) 737-0800
ORS.SC.GOV

10. Can you define "Affordable" for the ACP?
 - a. **Treasury's guidance provides flexibility for recipients of funds to best determine the threshold of affordability for their communities. ISPs are encouraged to consult with the community as part of the process they undertake to consider affordability and are required to publish the description of their methods for considering affordability in their project selection process. Treasury will also require pricing data as part of program performance and monitoring. ISPs must participate in the Federal Communications Commission's Affordable Connectivity Program, which provides eligible households with discounts on broadband internet access services and devices.**

ARPA Application Questions

1. If we have started a project "self-funded" in pink census blocks but know it will not be finished by June 2023, can we apply for funding of those census blocks?
 - a. **The ORS will only reimburse for costs in unserved census blocks incurred after the NTP is issued, under the ARAP SFRF grant program.**
2. Where would a ProjectID come from?
 - a. **Ignore this field for the map challenge, it is a field used for a grant application.**
3. Is there a full exemplary application?
 - e. **No**
4. Will this presentation be shared with attendees? Also, is this meeting/presentation being recorded for future playback by attendees?
 - a. **The meeting was not recorded. The slide deck of the presentation and FAQ will be posted on the ORS SFRF ARPA page.**
5. If a necessary part of a broadband network must be built through a funded or served area to make services available to a priority or unserved block, does that work also qualify for funding?
 - a. **Costs to build through a served area to get to an unserved are considered an eligible expense. However, drops to homes, business and the like within a served area is not an eligible expense.**

GIS Mapping Questions

1. Are these files (GIS Template Data), available?
 - a. **Files are available for download from the Citrix File Share folder for Map Challenges. They will also be made available through the scdigitaldrive.org hub site, which the SC Broadband Office maintains.**
2. We are required to serve more than 80% of housing units in the census block with adequate service in order to consider it served. In the Data Dictionary, there is a field "HUDensity" for approx. number of households in a given census block. Is this the standard value we should compare the # of households we serve against? i.e. we must serve more than 80% of HUDensity



Office of Regulatory Staff
1401 Main Street
Suite 900
Columbia, SC 29201
(803) 737-0800
ORS.SC.GOV

- a. **The field FUSEDHU represents a count of the total number of housing units in a given census block, according to US 2020 Census Data. The value should be considered a planning-level number and may differ from the actual number of housing units in a census block. Caution should be taken relying solely on the value census provides, as it may be an over-representation of the total number of housing units when evaluating whether a given ISP's build meets the 80% threshold. The data dictionary will be corrected to reflect this.**
3. If we have questions about symbolizing the data for the field "served", do we set up a call with James Tanis?
 - a. **The value "N" and "PA" in the served field will give you all areas eligible for funding.**
 - b. **The ORS will seek to develop a 'how to' that provides the steps necessary to symbolize map data to align with the eligibility map published on the ORS' website.**
4. What if you know there are homes in a NA block?
 - a. **Notify the Broadband Office as part of the Challenge process.**
 - b. **The ORS would prefer ISPs use their housing unit counts in a census block.**
5. Why is SC data due on the exact day it is due to the FCC? It would be appreciated to have a week's time at a minimum for carriers to produce state specific data.
 - a. **ORS has instituted a frictionless submission process whereby the State of South Carolina is requesting the same data submitted to the FCC. Should this approach create a challenge for ISPs serving multiple states, please communicate with the SC Broadband Office, and we will work to accommodate ISPs on a case-by-case basis.**
6. I am told by our GIS/Engineering team they are seeing the SC Broadband office address listed on each one. 1401 Main St, Suite 800, Columbia, 29201
 - a. **This is from the template GIS data. All data in the template files are examples and should be removed.**
7. We have a question about using Geo tagged photos as evidence for challenges and in future progress reports. Do you want one big batch of photos and you have a way of ID-ing them or mapping them? Do we need to create individual folders within our Citrix folder and save them based on the project area?
 - a. **All documentation relating to challenges to the eligibility map should be placed in the map challenge folder. One large batch of photos for the eligibility map challenge is fine.**
8. When filling in the template data for the "PerServed" field, I would like to know what percentage that is supposed to represent. Any clarification that you can provide would be greatly appreciated. Thank you and have a great day!
 - a. **It stands for the percent of served housing units in the census block**
9. Data in the K12TotStud field? Some have a value and some just say "YES"? Can you explain?
 - a. **The GIS Data dictionary defines this.**
 - b. **The examples listed above would suffice as long as there is an address tied it.**



Office of Regulatory Staff
1401 Main Street
Suite 900
Columbia, SC 29201
(803) 737-0800
ORS.SC.GOV

10. Will address level service availability/speeds/provider information become available from ORS at some point?

f. No provider information will be published at the address level from ORS

11. Shouldn't the unserved or underserved criteria be tied to the K-12 criteria? Otherwise the served areas throughout the state would be eligible?

a. All the priority areas are unserved. Unserved as defined by 3/2022 Eligibility Map

12. With regard to the GIS submission, what if there are no "fiber or cable routes" where high speed fixed wireless will be used?

a. If the technology being proposed is fixed wireless, please submit in place of the line work a coverage map in the format the FCC is requiring in Sept 2022.

13. Will the State Broadband Office be providing technical assistance to applicants during the course of this process?

a. Technical webinars will be offered.

14. Will any of the mapping layers be available to download? It's helpful to bring the data into our systems even if we will then build our project in the state mapping system for submission.

a. All GIS data is available on SCDigitaldrive.org and Citrix for download. One must fill out the data access request form to obtain access. <https://arcg.is/1fiq1j>